

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

THE ESTATE OF DEMETRIUS L. STEPHENSON
BY SPECIAL ADMINISTRATOR RICHARD COAD,

Plaintiff,

Case No. 22-cv-956

CALUMET COUNTY, ET AL,

Defendants.

**DEFENDANTS SHANNON TESKA, KRISTIN KLOTZ, AND KRISTI LECLAIR'S
RULE 50 MOTION FOR JUDGMENT AS A MATTER OF LAW**

PLEASE TAKE NOTICE that Defendants, Kristin Klotz, Shannon Teska, and Kristi LeClair (collectively, the “HHS Defendants”), file this renewed motion for judgment as a matter of law pursuant to Fed. R. Civ. P. 50 on all claims against them and as to their affirmative defense of qualified immunity. The grounds for this motion were set forth on the record during trial [ECF 326, p. 4], and will be supplemented with the brief to be filed on or before October 9, 2025 pursuant to the Court’s oral order that “a Party filing a Fed. R. Civ. Pr. Rule 50 Motion is due 30 days after the filing of the transcript.” [ECF 326, p. 6]; *see also* [ECF 331-336] (transcript of the jury trial filed on September 9, 2025).

Dated this 17th Day of September, 2025.

STADLER SACKS LLC
Attorneys for Defendants, Kristin Klotz,
Shannon Teska, and Kristi LeClair

By: /s/ Ronald S. Stadler
Ronald S. Stadler
State Bar No. 1017450
Jonathan E. Sacks
State Bar No. 1103204

303 North Main Street
West Bend, WI 53095
Telephone: 262-304-0610
e-mail: rss@stadlersacks.com
jes@stadlersacks.com